

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

GANART TECHNOLOGIES, INC.
Plaintiffs,

3:14-cv-616

V.

TURNKEY KIOSKS, LLC
Defendants.

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STIPULATED MOTION FOR LIMITED RELIEF

TO THE HONORABLE UNITED STATES DISTRICT JUDGE:

Plaintiff Ganart Technologies, Inc. (“Ganart”) and Defendant TurnKey Kiosks, LLC (“TurnKey”) submits the following Stipulated Motion for Limited Relief (“Stipulation”) from the Court’s order dated March 31, 2014 requiring counsel for the parties to participate in an in-person meeting to discuss the contents and preparation of the Joint Proposal for Contents of Scheduling and Discovery Order.

1. In Paragraph 1 of the Court’s March 31 Order, the Court required the parties to personally meet and agree to the contents of the Joint Report and discuss the other matters set out in the body of the March 31 Order.
2. Lead counsel for Defendant TurnKey has been admitted pro hac vice and maintains his office and practice in Tempe, Arizona. Requiring TurnKey’s lead counsel to incur the expense of traveling to Dallas, Texas for personally meeting with Plaintiff’s counsel would be an additional and unnecessary expense.
3. Counsel for both Plaintiff and Defendant have already conferred by phone, and are in the process of having additional discussions regarding the status of the litigation,

possible settlement, and dates for completion of discovery.

Because counsel for the parties believe they can amicably and efficiently consult with each other via phone to complete the items and tasks required in the March 31, 2014 Order, the parties jointly request that the Court allow them limited relief from the March 31, 2014 order to confer by phone rather than in person. A form of order reflecting the requested relief is attached hereto.

Respectfully submitted,

DAVIS MILES MCGUIRE GARDNER, PLLC

By: /s/ David W. Williams

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CERTIFICATE OF SERVICE

On April 22, 2014, I electronically submitted the foregoing document with the clerk of the court of the U.S. District Court, Northern District of Texas, using the CM/ECF system, which will send a notice of electronic filing to all counsel of record. I hereby certify that I have served all counsel of record electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

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/s/ David W. Williams
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